

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 173
DOCKET NO. M-100, SUB 163

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Petition for Investigation Regarding the
Reliability and Integrity of the Electric
Grid in North Carolina

In the Matter of
Investigation Regarding the Ability of
North Carolina's Electricity, Natural
Gas, and Water/Wastewater Systems to
Operate Reliably During Extreme Cold
Weather

AMENDED PETITION TO INTERVENE
OF CIGFUR I, II, AND III

NOW COME the Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), Carolina Industrial Group for Fair Utility Rates II (CIGFUR II), and Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (collectively, CIGFUR), pursuant to Commission Rules R1-5 and R1-19 and the Commission's Order Opening Investigation, Scheduling Technical Conferences, Requiring Responses, and Allowing Comments and Reply Comments issued in the above-referenced dockets on January 26, 2022, and file this amended petition to intervene. In support of this amended petition, CIGFUR respectfully shows as follows:

1. CIGFUR I is an association of large customers of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (DENC).
2. CIGFUR II is an association of large customers of Duke Energy Progress, LLC (DEP).

3. CIGFUR III is an association of large customers of Duke Energy Carolinas, LLC (DEC).
4. CIGFUR's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR may be contacted by email through its counsel at cress@bdixon.com.
5. As purchasers of electric power from DENC, DEP, and DEC, the member companies of CIGFUR I, II, and III, respectively, have direct, substantial and pecuniary interests in this proceeding.
6. On January 6, 2022, CIGFUR filed a petition to intervene in Docket No. E-100, Sub 173. The Commission has not yet ruled on that petition to intervene, but issued on January 26, 2022 an Order Opening Investigation, Scheduling Technical Conferences, Requiring Responses, and Allowing Comments and Reply Comments (Order) issued in the above-referenced dockets. As a result, CIGFUR is filing this Amended Petition to Intervene consistent with the Commission's January 26, 2022 Order.
7. CIGFUR's participation in these dockets will bring the important perspective of large, high load factor industrial customers of DENC, DEP, and DEC, particularly with regard to the importance of maintaining a reliable electric grid and a continuous, uninterrupted energy supply to the business operations of each CIGFUR member company.

8. CIGFUR's attorney, to whom all communications and pleadings should be addressed, is shown below:

Christina D. Cress
434 Fayetteville Street, Suite 2500
P.O. Box 1351 (zip 27602)
Raleigh, NC 27601
(919) 607-6055
ccress@bdixon.com

9. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding. As such, CIGFUR should be permitted to intervene and participate as a party to this proceeding.

10. Pursuant to Commission Rule R1-39, CIGFUR agrees to accept electronic service of all pleadings and other papers filed in this docket.

WHEREFORE, CIGFUR respectfully requests that the Commission issue an order allowing it to intervene and participate in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted, this the 28th day of January, 2022.

BAILEY & DIXON, LLP

/s/ Christina D. Cress
Christina D. Cress
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Attorneys for CIGFUR

VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says as follows: that she is the attorney for CIGFUR; that she has read the foregoing Amended Petition to Intervene and that the same is true of her personal knowledge, except as to any matters or things therein stated on information and belief, and as to those, she believes them to be true; and that she is authorized to sign this verification on behalf of CIGFUR.

This the 28th day of January, 2022.


Christina D. Cress

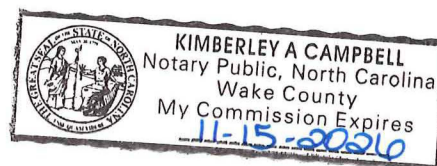
STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me

This 28th day of January, 2022, by Christina D. Cress.


Notary Public

Kimberley A. Campbell
Typed or Printed Notary Public Name



My Commission Expires: 11-15-2026

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR hereby certifies that she caused the foregoing *Amended Petition to Intervene* upon all parties of record to this proceeding by electronic mail.

This the 28th day of January, 2022.

/s/ Christina D. Cress
Christina D. Cress